

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-203 (PAM/KMM)

---

United States of America,

Plaintiff,

v.

**MOTION TO RETAIN  
ROUGH NOTES**

Francisco Manuel Rodriguez Valenzuela,

Defendant.

---

Defendant Francisco Miguel Rodriguez Valenzuela, by and through his attorney, Steven J. Wright, respectfully moves the Court for an order requiring all law enforcement personnel who have worked on this case to preserve and to continue to preserve all notes and memoranda originally prepared by them, regardless of the condition of those notes and regardless of whether those notes have been incorporated into other reports or memoranda that the government intends to turn over to the defendants. Depending on their contents, these rough notes may qualify as *Brady* or Jencks Act material at trial.

For the foregoing reasons, Defendant respectfully asks the Court to order law enforcement to preserve and maintain their rough notes.

Respectfully submitted,

Dated: October 11, 2020

/s/ Steven J. Wright  
Minnesota Attorney #387336  
331 Second Ave South, Ste 705  
Minneapolis, MN 55401  
(612) 669-8280

Attorney for Defendant